

Message

From: Baris, Reuben [Baris.Reuben@epa.gov]
Sent: 10/3/2017 8:48:45 PM
To: MARVIN, THOMAS [AG/1920] [thomas.marvin@monsanto.com]
CC: ty.t.vaughn@monsanto.com; Keigwin, Richard [Keigwin.Richard@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]
Subject: RE: Draft Proposed Labeling Plan--Confidential

Mr. Marvin,

The EPA shares the concern about 2017 reports of crop damage related to off-field movement of dicamba. It is of the utmost importance that the label changes we have worked on to address these issues are actualized in growers' hands for the 2018 season. Thank you for sharing the proposed plan you provided to the EPA in an attempt to address implementation of new dicamba labeling for *Xtendimax with Vaporgrip Technology* (EPA reg. no. 524-617) and ensure existing inventory is appropriately managed. Your plan summarizes the activities Monsanto will voluntarily undertake to relabel product that has already been produced for the 2018 growing season with the recently stamped label. There are three important points within the channels of trade that your proposed plan addresses to ensure product is appropriately re-packaged/re-labeled. 1) Material that is already on retail shelves (packaged, shipped, and ready for sale); 2) Material that has been packaged and shipped to warehouses, staged and ready for shipment to retail locations; and 3) Material that is scheduled to be produced/packaged for 2018 distribution.

Our cooperative objective is to reduce the number of off-field crop damage complaints linked to dicamba. To achieve this, we worked together to implement meaningful label changes and further restrict and clarify the use of *Xtendimax with Vaporgrip Technology* the 2018 season. Your plan achieves the desired outcome of relabeling *Xtendimax with Vaporgrip Technology* that is currently in the channels of trade. It is important to note, repackaging and relabeling are considered "production" activities and must be done at a registered establishment and reported by that establishment with its respective EPA Est. No. reflected on the label or container.

If you have any questions. Please do not hesitate to contact me directly.

Sincerely,
Reuben Baris

REUBEN BARIS | ACTING CHIEF | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: MARVIN, THOMAS [AG/1920] [mailto:thomas.marvin@monsanto.com]
Sent: Friday, September 29, 2017 4:53 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: RE: Draft Proposed Labeling Plan--Confidential

Reuben: Revised plan as discussed. As mentioned, we are looking for confirmation that this plan is acceptable.

Thanks,

Tom

Tom Marvin
Director, Federal Regulatory Affairs
1300 I Street, NW
Washington, DC 20005
Cell: 202-676-7846
Desk: 202-383-2851

From: MARVIN, THOMAS [AG/1920]
Sent: Friday, September 22, 2017 4:49 PM
To: 'Baris, Reuben' <Baris.Reuben@epa.gov>
Subject: Draft Proposed Labeling Plan--Confidential

Reuben: As promised. Happy to participate in any further discussion if helpful.

Thanks,

Tom

Tom Marvin
Director, Federal Regulatory Affairs
1300 I Street, NW
Washington, DC 20005
Cell: 202-676-7846
Desk: 202-383-2851

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